

From: [Rod Khavari](#)
To: [Christopher Moser](#)
Cc: [Farid Moghadassi](#)
Subject: RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge; Estate Bank Balance = \$5,937.66
Date: Thursday, July 29, 2021 11:09:21 AM
Attachments: [image001.png](#)
Importance: High

Chris:

I have reviewed the correspondence below and I am disappointed to see that GRC's confidential information (e.g. account status/balance) has been released to Robert Nicoud without authorization by GRC. Mr. Nicoud has channels through which he can properly obtain that information (e.g. discovery, subpoenas, etc.). Mr. Nicoud also knew that he is not necessarily entitled to that information, as suggested by his own email below inquiring about whether Padgett has authorization to release the information to Mr. Nicoud. As Plan Agent, your role is clearly defined by the Plan and assisting the Creditors in gathering information that can be used against the Debtor is not one of those authorities.

That said, unless authorized by the Plan or by order of the bankruptcy judge, you are not authorized to release any information to other parties without GRC's consent.

Finally, during the TRO hearing, you had indicated that you spoke to a realtor regarding pricing on the homes that remain in the Estate. Please share that information with GRC, as well.

Please let me know if you have any questions or would like to discuss this matter further.

Thank you,

Rod B. Khavari
Attorney and Counselor at Law

Khavari & Moghadassi, Attorneys at Law, P.C.

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this message by mistake, please immediately call us at 972.225.4444 and destroy the original message.
Thank you.

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From: Kimberly Hill <kimhill@qslwm.com>
Sent: Thursday, July 29, 2021 10:50 AM
To: Christopher Moser <cmoser@qslwm.com>; kaz danesh (cancunkaz@hotmail.com) <cancunkaz@hotmail.com>; Rod Khavari <rodk@dfwlawgroup.com>
Subject: RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge; Estate Bank Balance = \$5,937.66
Importance: High

The estate bank balance is \$5,937.66. See attached Form 2

Kimberly Hill
Paralegal to Chapter 7 Trustee, Christopher Moser
Quilling, Selander, Lownds, Winslett & Moser, P.C.
2001 Bryan Street Suite 1800
Dallas, TX 75201
214-871-2100 (main)
214-880-1817 (direct)
214-871-2111 (fax)

From: Christopher Moser <cmoser@qslwm.com>
Sent: Thursday, July 29, 2021 10:48 AM
To: kaz danesh (cancunkaz@hotmail.com) <cancunkaz@hotmail.com>; Rod Khavari <rodk@dfwlawgroup.com>
Cc: Kimberly Hill <kimhill@qslwm.com>
Subject: FW: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Do you want me to pay Statebridge?

Chris

Christopher J. Moser | Chapter 7 Trustee | Attorney
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law
Texas Board of Legal Specialization
Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201
Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>
Sent: Wednesday, July 28, 2021 4:12 PM
To: Christopher Moser <cmoser@qslwm.com>; Robert Nicoud <rmnicoud@dallas-law.com>
Cc: Cheyenne Zokaie <Cheyenne.Zokaie@padgettlawgroup.com>; kaz danesh (cancunkaz@hotmail.com) <cancunkaz@hotmail.com>; Kimberly Hill <kimhill@qslwm.com>; Rod

Khavari <rodk@dfwlawgroup.com>

Subject: RE: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Herein the amounts owed:

June payment: \$1021.67

July payment: \$1021.67

Potentially August payment: \$1021.67

Suspense (\$206.72)

Escrow installment

June: \$162.11

July: \$162.11

Potentially August \$162.11

Thank you Trustee Moser! Please let me know when they are issued and sent, so I can inform my client!

Regards,

Carlos Rafael



Carlos R. Hernandez-Vivoni*

Bankruptcy Attorney - Texas

5501 East LBJ Frwy, Ste. 925

Dallas, TX 75240

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Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas,

Cheyenne.Zokaie@padgettlawgroup.com

From: Christopher Moser <cmoser@qslwm.com>

Sent: Wednesday, July 28, 2021 2:52 PM

To: Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>; Robert Nicoud <rmnicoud@dallas-law.com>

Cc: Cheyenne Zokaie <Cheyenne.Zokaie@padgettlawgroup.com>; kaz danesh (cancunkaz@hotmail.com) <cancunkaz@hotmail.com>; Kimberly Hill <kimhill@qslwm.com>; Rod

Khavari <rod@dfwlawgroup.com>

Subject: RE: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

What do you show as past due? I'll get it paid.

Chris

Christopher J. Moser | Chapter 7 Trustee | Attorney

Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law

Texas Board of Legal Specialization

Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201

Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>

Sent: Wednesday, July 28, 2021 12:15 PM

To: Christopher Moser <cmoser@qslwm.com>; Robert Nicoud <rmnicoud@dallas-law.com>

Cc: Cheyenne Zokaie <Cheyenne.Zokaie@padgettlawgroup.com>

Subject: RE: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Good afternoon Trustee Moser:

My client wants to move with a Notice of Default under the plan, as the mortgage is currently due for 6/1/2021.

Just wondering if those payments are in transit, or are to be paid soon, in order to avoid unnecessary efforts.

Please let me know!

Best Regards,

Carlos Rafael



Carlos R. Hernandez-Vivoni*

Bankruptcy Attorney - Texas

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Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas,
Cheyenne.Zokaie@padgettlawgroup.com

From: Christopher Moser <cmoser@qslwm.com>
Sent: Thursday, May 20, 2021 9:52 AM
To: Robert Nicoud <rmnicoud@dallas-law.com>; Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>
Subject: RE: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Carlos,

Please give Mr. Nicoud and me the unpaid balance of the loan.

Chris

Christopher J. Moser | Chapter 7 Trustee | Attorney
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law
Texas Board of Legal Specialization
Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201
Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: Robert Nicoud <rmnicoud@dallas-law.com>
Sent: Thursday, May 20, 2021 9:44 AM
To: Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>
Cc: Christopher Moser <cmoser@qslwm.com>
Subject: [EXTERNAL] - RE: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Carlos:

Do you have permission to tell me the current balance. I am including Chris Moser in this email as he is the post-confirmation plan agent who is handling payments for GRC.

Thanks for your assistance.

Robert M. Nicoud, Jr.
(214) 540-7542

From: Carlos Hernandez <Carlos.Hernandez@padgettlawgroup.com>
Sent: Wednesday, May 12, 2021 11:10 AM

To: Robert Nicoud <rmnicoud@dallas-law.com>

Subject: Loan # [REDACTED] GRC Dallas Homes LLC - Statebridge

Hello brother counsel Nicoud:

Herewith my contact information to open the channels of communication on this matter .

Regards,

Carlos Rafael

P.S.

I'm sharing here with you the Deed of Trust, as this one is public information.



Carlos R. Hernandez-Vivoni*

Bankruptcy Attorney - Texas

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Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas,

Cheyenne.Zokaie@padgettlawgroup.com

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